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8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 EILEEN WALDRON, individually and on
behalf of all others similarly situated,

12 Plaintiff,

13 vs.

14 CREDIT ONE BANK, N.A., a national
15 bank,

16 Defendant.
17

CASE NO.: 2:18-cv-01451-MMD-PAL

**STIPULATION AND ORDER FOR
EXTENSION TO RESPOND TO
COMPLAINT**

(SECOND REQUEST)

18 Plaintiff Eileen Waldron ("Plaintiff") and Defendant Credit One Bank, N.A. ("Credit
19 One"), by and through their undersigned counsel (collectively, the "Parties"), for good cause
20 shown, hereby stipulate and agree to extend Credit One's deadline to respond to Plaintiff's
21 Complaint [ECF No. 1] by fifteen (15) days, to October 16, 2018. This is the Parties' second
22 extension request. In support of their request, the Parties stipulate and agree as follows:

- 23 1. Plaintiff served the Complaint and Summons on Credit One on August 9, 2018.
- 24 2. Credit One's response to that Complaint is currently due October 1, 2018.
- 25 3. Recently, Credit One has provided Plaintiff with records regarding Plaintiff's
26 claims and Credit One's defenses, in an effort to discuss the merits of the action and to determine
27 in good faith whether the claims might be resolved before further action in the litigation is
28 required.

4. The Parties are thus reviewing these records and discussing early resolution alternatives.

5. If the Parties can resolve this matter before Credit One needs to respond to the Complaint, it will preserve both the Parties' and the Court's resources.

6. For that reason, on September 25, 2018, the Parties agreed to the further short extension requested herein.

7. This stipulated extension request is sought to continue the Parties' good faith efforts to resolve this dispute and is not made for the purpose of delay.

Therefore, the Parties jointly agree to extend Credit One's deadline to respond to Plaintiff's Complaint to October 16, 2018.

DATED: September 25, 2018

DATED: September 25, 2018

KAUFMAN P.A.

SNELL & WILMER L.L.P.

By: /s/ *Avi R. Kaufman*

By: /s/ *Michael Paretti*

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*Attorneys for Plaintiff Eileen Waldron and
the putative Classes*

*Attorneys for Defendant Credit One Bank,
N.A.*

ORDER

IT IS ORDERED that Credit One shall respond to Plaintiff's Complaint on or before October 16, 2018.

DATED: September 28, 2018.

Tyrr A. Green
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen
3 (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be
4 served a true and correct copy of the foregoing **STIPULATION AND ORDER FOR**
5 **EXTENSION TO RESPOND TO COMPLAINT** by the method indicated:



7 **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for
8 electronic filing and service upon the Court's Service List for the above-referenced
9 case.

10 DATED this 25th day of September, 2018.

11 /s/ Maricris Williams

12 An Employee of Snell & Wilmer L.L.P.

13 4848-2403-4676.2